

August 19, 2019

REPLY TO GENERAL OBJECTION

Claim number: 31106

Name: Ernesto Rodríguez-Rodríguez y Gloria L. Díaz-López

COTTEES UAD 9/17/98

FBO: Rodríguez-Díaz

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U.S. DISTRICT COURT FOR THE DISTRICT OF P.R.

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In re:

Commonwealth of Puerto Rico -- Debtors

Financial Supervision and Administration Board

For P.R. – Debtor Representative - Claim # 31106

PROMESA

Title III

Num: 17BK3283-LTS

This reply is in accordance with  
the Sixty-Fourth Global Objection  
of the Commonwealth of P.R. to claims  
based on mutual funds investments

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SAN JUAN, P.R.

REPLY TO THE SIXTYFOURTH GLOBAL OBJECTION OF THE COMMONWEALTH OF P.R., Claim #: 31106

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We dispute the "Global Objection" trusting that this reply will be evaluated by the Hon. Court, and as Trustor and Trustee of the Rodríguez-Díaz FBO we claim the following:

- 1- The GO'S subject of the CLAIM are part of the Mutual Funds in the Ernesto Rodríguez-Rodríguez y Gloria L. Díaz-López Trust COTTEES UAD 9/17/98 FBO Rodríguez-Díaz (I.N. 66-6021871)
- 2- Said Funds are identified as:
  - a) First P.R. Tax Exempt Target MAT FD COM CASH DIV; emitted on 02/27/03 and under CUSIP # 33611R102
  - b) First P.R. Target MAT Income; emitted on 08/03/05 and under CUSIP # 33612V102
  - c) First P.R. Tax Advantaged Target MAT FD II INC COM emitted on 02/15/06 and under CUSIP # 336128103
- 3- The investments made in the Mutual Funds identified here and protected under FBO Rodríguez-Díaz (of which Ernesto Rodríguez-Rodríguez y Gloria L. Díaz López are Trustors and Trustees), were done so through Santander Securities with the objective of securing our retirement, and believe that for justice to be properly served, the GO's contained in them should be considered in the CLAIM. Said investments correspond to a series emitted in 2003, 2005, and 2006. Therefore, there are in no way related to the GO's labeled as "Challenged GO Bonds," which belong to a different series emitted in 2012 and 2014 under different CUSIP numbers.
- 4- The Proof of Claim related to the GO'S in said Mutual Funds was properly submitted via certified mail on May 17, 2018 and stamped as received by the Claim Processing Center C/O Prime Clerk LCC, on May 24, 2018.
- 5- Similarly, on the same date and in the same form, Proof of Claim or "Evidencia de Reclamación contra Puerto Rico Sales Tax Financing Corporation (COFINA)" was submitted.
- 6- As a matter of fact, it was with full conviction of the legality and constitutionality of the GO's in the Mutual Funds emitted in 2003, 2005, and 2006, that we submitted our opinion in favor of the default of the series highlighted in the "Notice of Omnibus Objection". Said NOTICE OF PARTICIPATION IN OMNIBUS OBJECTION TO CLAIMS FILED OR ASSERTED BY HOLDERS OF CERTAIN COMMONWEALTH GENERAL OBLIGATIONS BONDS was sent via certified mail and stamped as received by The Clerk of the USDC for District P.R. on 03/25/19.

JUSTIFICATIVE DOCUMENTATION

- 1- Copy of page 32 of the "Anexo A" part of the Notice of Omnibus Objection of (I) Financial Oversight and Management Board, acting through its special Claims Committee, and (II) Official Committee of Unsecured 502 and Bankruptcy rule 3007, to claim filed or asserted by Holders of Certain Commonwealth GO'S; where, under #173, ERNESTO RODRÍGUEZ RODZ's name appears with the claim number 31106.
- 2- Proof of Claim submitted on May of 2018 to the Commonwealth of P.R. Claim Processing Center via certified mail in regards to both GO'S in the Mutual Funds and COFINA Bonds.
- 3- Financial Statement originated by Santander Securities under ERNESTO RODRÍGUEZ RODRÍGUEZ Y GLORIA L DÍAZ LÓPEZ CO-TTEES UAD 9/17/98 FBO RODRÍGUEZ DÍAZ from July 1st, 2017 - Julio 31, 2017, where the above-mentioned Mutual Funds' CUSIP series and numbers are specified. This document had already been submitted along with the Proof of Claim from May of 2018.
- 4- Copy of the appropriately stamped acknowledgements of receipt received on May 24, 2018, which correspond to both Proof of Claims mentioned above.
- 5- Copy of the dutifully executed Notice of Participation in Omnibus Objection to Claims filed or asserted by Holders of Certain GOS Bonds, along with the related copy of acknowledgement of receipt stamped on 3/25/19. Additionally, attached please find a copy of the list of CUSIP numbers of the General Obligations Bonds affected by the Objection, which are unrelated to the CUSIP numbers of the GO's that may be held in the Mutual Funds highlighted here.
- 6- Three different informative reports belonging to each of the Mutual Funds alluded to and where the type of investments in each one, as well as the proportion of investment in GO's, are explained in detail.

Respectfully,

A handwritten signature in black ink, appearing to read 'Gloria L. Díaz-López', with a stylized flourish at the end.

Gloria L. Díaz-López/ CTTEE  
FBO Rodríguez-Díaz